



**CERTIFICATION**

April 1, 2021

Via Email to [chambers\\_of\\_judge\\_wolson@paed.uscourts.gov](mailto:chambers_of_judge_wolson@paed.uscourts.gov)

United States District Court  
Eastern District of Pennsylvania  
Honorable Joshua D. Wolson  
601 Market Street  
Room 3809  
Philadelphia, PA 19106-1726

RE: Lisa Barbounis v. The Middle East Forum  
No. 2:19-cv-05030-JDW

Dear Judge Wolson:

I write in connection with the Court's Order dated December 4, 2020.

This letter is to certify that Plaintiff has completed all requirements of the December 4, 2020 Order. The final requirement was that Plaintiff undergo six credits of continuing legal education focused on e-discovery. Plaintiff completed seven credits. The seventh credit hour was not focused on e-discovery. It was a course entitled What Every In-House Counsel Needs to Know to Avoid Discovery Related Sanctions.

I have attached the certificates of completion to this e-mail. As Ordered by the Court, none of these credits were used in connection with counsel's annual obligations.

Very Truly Yours,  
**DEREK SMITH LAW GROUP, PLLC**

BY: /s/ Seth D. Carson  
Seth D. Carson, Esquire

CC: